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8

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

11 LAMONT TARKINGTON,

12 Plaintiff,

13 vs.

14  
15 COUNTY OF LOS ANGELES; LOS  
16 ANGELES COUNTY SHERIFF’S  
17 DEPARTMENT; LOS ANGELES  
18 COUNTY SHERIFF JIM MCDONNELL;  
19 LAUREN BROWN; JAMES MURREN;  
20 DONALD YOUNG; LAWRENCE  
21 BEACH ALLEN CHOI PC; and DOES 1-  
22 10 INCLUSIVE;

23 Defendants.

) Case No.: 2:18-CV-07636-CJC-JC

)

) **PLAINTIFF’S NOTICE OF MOTION**

) **AND MOTION TO ENFORCE**

) **SETTLEMENT AGREEMENT**

)

) Date: July 20, 2020

) Time: 1:30 p.m.

) Ctrm.: 7C

) Judge: Hon. Cormac J. Carney

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23 PLEASE TAKE NOTICE that on July 13, 2012 at 1:30 p.m. in Courtroom 7C of  
24 the above-entitled Court before the Hon. Cormac J. Carney, Plaintiff LaMont Tarkington  
25 ( “Plaintiff”) will and does move the Court for an Order to enforce the settlement  
26 agreement.

27 Plaintiff met and conferred with Defendants before filing this motion pursuant to  
28 Local Rule 7-3.

1 On December 3, 2019, the parties agreed to settle the above-captioned matter for a  
2 certain amount. Defendants informed Plaintiff that the County of Los Angeles Board of  
3 Supervisors will need 6-months to approve the settlement.

4 Over 6-months has passed since the settlement and Defendants still have not  
5 approved the settlement. Defendants have not provided a date certain as to when the  
6 settlement agreement will be approved.

7 By delaying the approval of the settlement, Defendants are getting the benefit of  
8 not having to pay the settlement amount.

9 Defendants should not be allowed to keep the settlement amount by not taking  
10 proactive steps to approve the settlement.

11 Based on the foregoing, Plaintiff respectfully requests an Order for the following:

12 That Defendants approve and pay the full settlement amount within 30-days;

13 That Defendants will incur interests on any unpaid portion of the settlement  
14 amount at 10% per month if the full settlement amount is not paid within 30-days of the  
15 Order instructing Defendants to approve and pay the full settlement amount within 30-  
16 days;

17 That Plaintiff will have the option of rescinding the settlement agreement and  
18 continue to pursue the civil action against Defendants if the full settlement amount is not  
19 paid within 30-days of the Order instructing Defendants to approve and pay the full  
20 settlement amount within 30-days.

21 All other relief the Court deems just and proper.

22  
23 Dated: June 15, 2020

By: /s/ Leo James Terrell  
Leo James Terrell, Esq.  
Attorneys for Plaintiff,  
LaMont Tarkington